## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
Oder Health Com. Lea	:	O NI- 10 71740 (ACT)
Orion HealthCorp, Inc.	:	Case No. 18-71748 (AST)
Constellation Healthcare Technologies, Inc.	:	Case No. 18-71749 (AST)
NEMS Acquisition, LLC	:	Case No. 18-71750 (AST)
Northeast Medical Solutions, LLC	:	Case No. 18-71751 (AST)
NEMS West Virginia, LLC	:	Case No. 18-71752 (AST)
Physicians Practice Plus, LLC	:	Case No. 18-71753 (AST)
Physicians Practice Plus Holdings, LLC	:	Case No. 18-71754 (AST)
Medical Billing Services, Inc.	:	Case No. 18-71755 (AST)
Rand Medical Billing, Inc.	:	Case No. 18-71756 (AST)
RMI Physician Services Corporation	:	Case No. 18-71757 (AST)
Western Skies Practice Management, Inc.	:	Case No. 18-71758 (AST)
Integrated Physician Solutions, Inc.	:	Case No. 18-71759 (AST)
NYNM Acquisition, LLC	:	Case No. 18-71760 (AST)
Northstar FHA, LLC	:	Case No. 18-71761 (AST)
Northstar First Health, LLC	:	Case No. 18-71762 (AST)
Vachette Business Services, LTD.	:	Case No. 18-71763 (AST)
MDRX Medical Billing, LLC	:	Case No. 18-71764 (AST)
Vega Medical Professionals, LLC	•	Case No. 18-71765 (AST)
Allegiance Consulting Associates, LLC	·	Case No. 18-71766 (AST)
Allegiance Billing & Consulting, LLC		Case No. 18-71767 (AST)
Phoenix Health, LLC,		Case No. 18-71789 (AST)
Thomas Teath, BBC,	:	Cuse 110: 10 /1/07 (1101)
Debtors.	:	(Jointly Administered)
	:	
	X	
	X	
Orion Healthcorp, Inc., et al.,	:	
_, , , , , , ,	:	
Plaintiffs,	:	
v.	:	
	:	Adv. Pro. No. 18-08053
Parmjit Singh Parmar (a/k/a Paul Parmar), Sotirios Zahari	s,:	(AST)
Ravi Chivukula, Pavandeep Bakhshi, Naya Constellation	:	
Health, LLC, Alpha Cepheus, LLC, Constellation Health	:	
Investment, LLC, Constellation Health Group, LLC,	:	
Constellation Health, LLC, First United Health, LLC, Tair	a :	
no Kiyomori LLC, Blue Mountain Healthcare, LLC, CC	:	
Capital CHT Holdco LLC, CHT Holdco LLC, PBPP	:	
Partners LLC, Axis Medical Services, LLC, Vega Advanced	1:	
Care LLC, Pulsar Advance Care LLC, Lexington Landmar		
2012 22 3, 1 diour 110 and 2010 2010, 2011 Building	•	

Services LLC, MYMSMD LLC, PPSR Partners, LLC,
AAKB Investments Limited, Destra Targeted Income Unit
Investment Trust, on behalf of unitholders, a Delaware
Statutory Trust, United States of America, Aquila Alpha
LLC, 2 River Terrace Apartment 12J, LLC, Dioskouroi
Kastor Polydeuces, LLC, 21B One River Park LLC, Aquila:
Alshain LLC, Ranga Bhoomi LLC, Harmohan Parmar
(a/k/a Harry Parmar), Kiran Sharma, The Red Fronted
Macaw Trust, Young Conaway Stargatt & Taylor, LLP (in:
its capacity as Escrow Agent), Blue Cross Blue Shield of
South Carolina, Honorable Trinidad Navarro, Insurance
Commissioner of the State of Delaware, in his capacity as
Receiver, and John Does 1 through 100 inclusive,

Defendants.

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## AMENDED NOTICE OF MOTION FOR A STAY OF ACTION UNDER THE FIFTH AMENDMENT TO THE UNITED STATES CONSTITUTION

PLEASE TAKE NOTICE that upon the application of Defendants, Parmjit Singh Parmar (a/k/a Paul Parmar), Naya Constellation Health, LLC, Alpha Cepheus, LLC, Constellation Health Investment, LLC, Constellation Health Group, LLC, Constellation Health, LLC, First United Health, LLC, Taira no Kiyomori LLC, Blue Mountain Healthcare, LLC, PBPP Partners LLC, Axis Medical Services, LLC, Vega Advanced Care LLC, Pulsar Advance Care LLC, Lexington Landmark Services LLC, MYMSMD LLC, PPSR Partners, LLC, 2 River Terrace Apartment 12J, LLC, Dioskouroi Kastor Polydeuces, LLC, 21B One River Park LLC, Aquila Alshain LLC, Ranga Bhoomi LLC, Harmohan Parmar (a/k/a Harry Parmar), Kiran Sharma, The Red Fronted Macaw Trust ("Moving Defendants"), by their attorney, Charles E. Simpson, Esq., Moving Defendants will move this Court before the Hon. Alan S. Trust, U.S.B.J., at the Courthouse located at 100 Federal Plaza, Courtroom 960, Central Islip, New York 11722, on September 21, 2020, at 11:00 in the forenoon or as soon thereafter as counsel can be heard, for an order pursuant to 11 USC §105, staying this case as against moving

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Defendants under the Fifth Amendment to the United States Constitution, and for such other and further relief as to this Court may seem just, equitable and proper.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief herein shall be in writing, shall state with particularity the grounds for the objection, shall be filed with the Clerk of the Bankruptcy Court, and served upon the undersigned counsel for the Plaintiff at least seven (7) days prior to the hearing date of the within motion.

Dated: New York, New York June 24, 2020

## WINDELS MARX LANE & MITTENDORF, LLP

By: /s/ Charles E. Simpson

Charles E. Simpson A Member of the Firm

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Attorneys for Defendants, PARMJIT SINGH PARMAR, et al.